

Wolff & Samson PC  
One Boland Drive  
West Orange, New Jersey 07052  
(973) 325-1500  
Attorneys for Defendant Time Warner Cable Inc.

HAROLD M. HOFFMAN, individually and on  
behalf of those similarly situated,  
  
Plaintiff,  
  
- *against* -  
  
TIME WARNER CABLE INC.,  
  
Defendant.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

Civil Action: 2:12-cv-00978-ES-CLW

**STIPULATION AND PROPOSED  
SCHEDULING ORDER**

DOCUMENT ELECTRONICALLY FILED

It is hereby stipulated and agreed by and between counsel for plaintiff Harold M. Hoffman (“Hoffman”) and counsel for defendant Time Warner Cable Inc. (“Time Warner Cable”), subject to the approval of the Court, as follows:

1. The time for Time Warner Cable to move or answer in response to the Amended Complaint is extended to April 13, 2012.
2. In the event that Time Warner Cable, in response to the Amended Complaint, files a motion to dismiss, Hoffman’s opposing papers are due on or before May 11, 2012, and Time Warner Cable’s reply papers are due on or before May 25, 2012.
3. Based on the schedule set forth in paragraphs 1 and 2 above relating to the Amended Complaint, Time Warner withdraws without prejudice the pending motion to dismiss the Original Complaint filed on March 9, 2012.

Respectfully submitted,

/s/ William E. Goydan  
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WILLIAM E. GOYDAN  
Wolff & Samson PC  
One Boland Drive  
West Orange, New Jersey 07052  
973-530-2022  
*Attorneys for Defendant*  
Dated: March 19, 2012

/s/ Philip C. Chronakis  
\_\_\_\_\_  
PHILIP C. CHRONAKIS  
Chronakis Siachos, LLC  
50 Harrison Street  
Suite 315  
Hoboken, New Jersey 07030  
201-792-7777  
*Attorneys for Plaintiff*  
Dated: March 19, 2012

It is **SO ORDERED**.

BY THE COURT:

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Esther Salas, U.S.D.J.